

EXHIBIT B

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AUDLEY BARRINGTON LYON, JR., <i>et al.</i> ,)	
)	No. 3:13-cv-05878-EMC
)	
Plaintiffs,)	DECLARATION OF
)	
vs.)	Dana Fishburn
)	
U.S. IMMIGRATION & CUSTOMS)	
ENFORCEMENT, <i>et al.</i> ,)	
)	
Defendants.)	Judge: Hon. Edward M. Chen
)	

I, DANA FISHBURN declare and state as follows:

1. I am an officer with the U.S. Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations, Sacramento, California.

- 1 2. The facts contained in this declaration are known personally to me and if called upon
2 to testify as a witness thereto, I could and would competently do so under oath.
- 3 3. As a part of my job, I regularly visit Yuba County Jail, usually four to five days a
4 week.
- 5 4. The Settlement Agreement and Exhibits were posted in common areas of housing
6 units at the Yuba County Jail on or before July 18, 2016.
- 7 5. The English, Spanish, Arabic, Chinese, French, Punjabi, Somali and Vietnamese
8 translations of the Class Notice were posted in common areas of housing units at
9 Yuba County Jail on or before July 18, 2016.
- 10 6. The postings will remain in place until the Court issues an order approving or
11 rejecting the Settlement.
- 12 7. Individual copies of the notices were not provided to detainees housed in medical or
13 holding as detainees housed in those units are not restricted from common areas
14 during waking hours, where notices are posted.
- 15 8. Individual copies of the notices were not provided to detainees in segregation because
16 those detainees have access to the common rooms for one hour per day during waking
17 hours, where the notices are posted.
- 18 9. As of September 12, 2016, Defendants and facility staff are now handing out
19 individual copies of the notices to detainees held in segregation, medical, holding and
20 other specialized units with restricted access to common areas during facility waking
21 hours. Copies will continue to be distributed as necessary as new detainees come into
22 these units until the Court issues an order approving or rejecting the settlement.
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1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on September 14, 2016

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